

NDA 021877/S-010

# SUPPLEMENT APPROVAL FULFILLMENT OF POSTMARKETING REQUIRMENT

Novartis Pharmaceuticals Corporation Attention: Luz Patricia Lee Sr. Associate Director, Regulatory Affairs One Health Plaza East Hanover, NJ 07936-1080

Dear Ms. Lee:

Please refer to your supplemental new drug application (sNDA) dated October 16, 2018, received October 16, 2018, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for ARRANON (nelarabine) injection.

This Prior Approval supplemental new drug application provides data to address PMR 1284-1 and also provides for major modifications of the following sections of the United States Prescribing Information: clarification of the age range for the intended population in Section 1; updating the information on neurotoxicity in Section 5; addition of safety results from Stud AALL0434 in Section 6, and updating the summary of the pediatric experience in Section 8.

#### **APPROVAL & LABELING**

We have completed our review of this application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed agreed-upon labeling.

#### **CONTENT OF LABELING**

As soon as possible, but no later than 14 days from the date of this letter, submit the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format using the FDA automated drug registration and listing system (eLIST), as described at FDA.gov.<sup>1</sup> Content of labeling must be identical to the enclosed labeling (text for the Prescribing Information and Patient Package Insert), with the addition of any labeling changes in pending "Changes Being Effected" (CBE) supplements, as well as annual reportable changes not included in the enclosed labeling.

U.S. Food and Drug Administration Silver Spring, MD 20993 www.fda.gov

<sup>1</sup> http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm

Information on submitting SPL files using eList may be found in the guidance for industry SPL Standard for Content of Labeling Technical Qs and As.<sup>2</sup>

The SPL will be accessible from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that include labeling changes for this NDA, including CBE supplements for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 314.50(I)(1)(i)] in Microsoft Word format, that includes the changes approved in this supplemental application, as well as annual reportable changes. To facilitate review of your submission(s), provide a highlighted or marked-up copy that shows all changes, as well as a clean Microsoft Word version. The marked-up copy should provide appropriate annotations, including supplement number(s) and annual report date(s).

#### **SUBPART H FULFILLED**

We approved this NDA under the regulations at 21 CFR 314 Subpart H for accelerated approval of new drugs for serious or life-threatening illnesses. Approval of this supplement fulfills your commitments made under 21 CFR 314.510.

#### REQUIRED PEDIATRIC ASSESSMENTS

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients (which includes new salts and new fixed combinations), new indications, new dosage forms, new dosing regimens, or new routes of administration are required to contain an assessment of the safety and effectiveness of the product for the claimed indication in pediatric patients unless this requirement is waived, deferred, or inapplicable.

Because none of these criteria apply to your application, you are exempt from this requirement.

### FULFILLMENT OF POSTMARKETING REQUIREMENT

We have received your submission dated October 16, 2018, containing the final report for the following postmarketing requirement listed in the October 28, 2005 approval letter and revised PRM milestone letters issued December 31, 2014 and August 14, 2017 for this application.

<sup>&</sup>lt;sup>2</sup> We update guidances periodically. For the most recent version of a guidance, check the FDA Guidance Documents Database <a href="https://www.fda.gov/RegulatoryInformation/Guidances/default.htm">https://www.fda.gov/RegulatoryInformation/Guidances/default.htm</a>.

PMR 1284-1 Submit the results of the proposed Phase 3 trial (AALL0434) to be conducted by the Children's Oncology Group to demonstrate nelarabine's clinical benefit.

We have reviewed your submission and conclude that the above requirement was fulfilled.

This completes all of your postmarketing requirements and postmarketing commitments acknowledged in our October 28, 2005 and July 3, 2018 approval letters.

#### PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit the following, in triplicate, (1) a cover letter requesting advisory comments, (2) the proposed materials in draft or mock-up form with annotated references, and (3) the Prescribing Information to:

OPDP Regulatory Project Manager Food and Drug Administration Center for Drug Evaluation and Research Office of Prescription Drug Promotion (OPDP) 5901-B Ammendale Road Beltsville, MD 20705-1266

Alternatively, you may submit a request for advisory comments electronically in eCTD format. For more information about submitting promotional materials in eCTD format, see the draft guidance for industry *Providing Regulatory Submissions in Electronic and Non-Electronic Format-Promotional Labeling and Advertising Materials for Human Prescription Drugs.*<sup>3</sup>

You must submit final promotional materials and Prescribing Information, accompanied by a Form FDA 2253, at the time of initial dissemination or publication [21 CFR 314.81(b)(3)(i)]. Form FDA 2253 is available at FDA.gov.<sup>4</sup> Information and Instructions for completing the form can be found at FDA.gov.<sup>5</sup> For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see FDA.gov.<sup>6</sup>

<sup>&</sup>lt;sup>3</sup> When final, this guidance will represent the FDA's current thinking on this topic. For the most recent version of a guidance, check the FDA guidance web page at <a href="https://www.fda.gov/RegulatoryInformation/Guidances/default.htm">https://www.fda.gov/RegulatoryInformation/Guidances/default.htm</a>.

<sup>&</sup>lt;sup>4</sup> http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf

<sup>&</sup>lt;sup>5</sup> http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf

<sup>&</sup>lt;sup>6</sup> http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm

## **REPORTING REQUIREMENTS**

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

If you have any questions, call Bernetta Lane, Regulatory Project Manager, at (301) 796-0937.

Sincerely,

{See appended electronic signature page}

Ann T. Farrell
Director
Division of Hematology Products
Office of Hematology and Oncology Products
Center for Drug Evaluation and Research

#### **ENCLOSURE:**

- Content of Labeling
  - o Prescribing Information
  - o Patient Package Insert

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This is a representation of an electronic record that was signed
electronically. Following this are manifestations of any and all
electronic signatures for this electronic record.

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/s/

ANN T FARRELL 07/31/2019 09:44:42 AM